

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

---

Thomas Hunziker as trustee for the  
next of kin of ALH,

Civil File No.: 20-cv-2188 (NEB/TNL)

Plaintiff,

vs.

Patricia Doherty, in her individual capacity;  
County of Hennepin, Minnesota;  
Robert Marshall, M.D.; Kristen Medhanie;  
and Allina Health System,

Defendants.

---

**STATEMENT THAT ENTIRE DOCUMENT IS CONFIDENTIAL OR  
IMPRACTICABLE TO REDACT**

---

Exhibit A to the Declaration of Kimberly M. Kelsey in Support of Memorandum of Law in Opposition to Plaintiff's Motion to Compel Inspection of ALH's Electronic Medical Records dated November 2, 2021 is filed under seal because it is confidential and impracticable to redact.

**BASSFORD REMELE**

*A Professional Association*

Dated: November 2, 2021

By s/ Mark R. Bradford

Rebecca Egge Moos (MN #74962)

Mark R. Bradford (MN #335940)

Anuradha Chudasama (MN #394935)

100 South 5th Street, Suite 1500

Minneapolis, MN 55402-1254

Telephone: (612) 333-3000

bmoos@bassford.com

mbradford@bassford.com

achudasama@bassford.com

*Attorneys for Defendants Robert Marshall, M.D.,  
Kristen Medhanie, and Allina Health System*